

Privileged and Confidential Joint Defense Communication

SBA Shipyard Site PRP Group

Jennings, LA

October 21, 2020

Michael Torres
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RE: **Tributyltin**
SBA Shipyard Superfund Site, Jennings, Louisiana

Dear Mr. Torres,

The SBA Shipyard Site Potentially Responsible Parties (PRP) Group (referred to herein as SBA PRP Group) is providing this correspondence to the United States Environmental Protection Agency (USEPA) and the Louisiana Department of Environmental Quality (LDEQ) based on a telephone discussion with USEPA and LDEQ on October 1, 2020, regarding the potential for the presence of tributyltin (TBT) at the SBA Shipyard Superfund Site in Jennings, Louisiana (referred to herein as Site).

During the telephone call on October 1, 2020, LDEQ cited the SBA Shipyard Site's Hazard Ranking System (HRS) Document Record (HRS document: <https://semspub.epa.gov/work/06/300408.pdf>) as the basis for determining that sandblasting and painting activities had been reported at the Site. LDEQ noted that the dry dock was the most likely location for those activities to have been conducted but cited other potential locations as well. LDEQ reviewed the sampling procedures for organics and inorganics and noted that neither tin nor TBT was included in USEPA's analytical list.

LDEQ also discussed their experience with the Southern Shipbuilding site, which is a barge cleaning, maintenance, and repair site located in Slidell, Louisiana. TBT was identified at the Southern Shipbuilding site in the graving dock area and an area fanning out from the graving dock where the materials/waste were flushed out. These findings were made during USEPA's site investigations in the 1990s.

Based on the comments during the call, it is the SBA PRP Group's understanding that the LDEQ believes TBT is a potential issue at the SBA Shipyard Site and may need to be evaluated based primarily on historical comparisons between the SBA Shipyard Site and the Southern Shipbuilding site or other unidentified shipyard sites in the state of Louisiana.

EHS Support has conducted a review of the site assessment and remedial reports for the Southern Shipbuilding site. Based on our findings, though there are some general similarities, it is not appropriate to draw direct comparisons between the two sites for several reasons including the scale of operations, the levels of contamination (i.e., notably greater at the Southern Shipbuilding site), and the nature of the reported on-site activities.

Therefore, we are providing several technical lines of evidence supporting our assertion that there is no reasonable justification to evaluate TBT at the SBA Shipyard Site. This position is based on review of information pertaining to the Southern Shipbuilding site, understanding of past operations and site-specific

data collected from the SBA Shipyard Site, understanding of the historical uses of TBT as an anti-fouling coating on marine vessels, and general marine industry experience. The evidence supporting this position follows:

- **Lack of blast sand:** No evidence of sandblasting media has been found at the SBA Shipyard Site in borings or sediment samples indicating that sandblasting operations were not significant. None was noted inside the dry dock which is where blasting and painting of vessels most likely would have occurred. On the contrary, the riverbed within the dry dock was noted to lack unconsolidated sediments and was reported to be primarily composed of firm clay. In contrast, the Southern Shipbuilding site had 1-foot thick deposits of blast sand (8,000 cubic yards were excavated) in their graving dock.
- **Lack of high lead concentrations:** Lead was commonly used in paint and is known to be present in blast media at a high concentration, making lead a good indicator of the potential presence of TBT. Lead concentrations on the SBA Shipyard Site, particularly in the dry dock, were not detected at concentrations that would be expected if significant sandblasting activities had been conducted.
- **Historical use of TBT in the marine shipping industry:** The use of TBT as an anti-fouling agent was prevalent in vessels that would be used in the marine environments due to its effectiveness as a biocide. It was primarily used to discourage the growth of marine organisms such as barnacles, bacteria, tube worms, mussels, and algae¹. It was not commonly used on inland vessels that were primarily used in freshwater or slightly brackish environments. The voyage from the Gulf of Mexico to the SBA Shipyard Site is more than 40 miles upriver, making it an unattractive location for marine vessels to be serviced. This is especially true given the large number of shipyards capable of providing similar sandblasting and painting services located along the gulf shoreline. Thus, the likelihood of TBT being used on barges services at the SBA Shipyard site is low. Moreover, the use of TBT on vessels less than 25 meters in length was banned in the United States in 1988. If LDEQ is aware of other inland shipyard sites where TBT was a contaminant of concern or potential risk driver, that information would help assess whether conditions or activities at the SBA Shipyard Site are similar.
- **River accessibility by marine ships:** The depth of the Mermentau River (i.e., 12 feet or less in depth) would not have allowed large marine ships to access the SBA Shipyard Site. Because of this, the location of the SBA Shipyard Site does not lend itself to regular access by large marine vessels.
- **No evidence of substantial painting operations sufficient for anti-fouling applications:** In the available historical SBA Shipyard records, large containers of paint (e.g., drums) were not identified at the SBA Shipyard, indicating that significant volumes of anti-fouling chemicals such as TBT were not used on-site either.

Also, the comment LDEQ made regarding potentially wanting to look at other locations besides the dry dock does not align with the SBA Shipyard Site operations, in EHS Support's opinion, for the following reasons:

- **Dry dock is the only realistic location for biofouling chemicals:** Records indicate that barges and boats that would be of the size appropriate for ocean voyages would have only been repaired in the dry dock. The lack of blast material in the dry dock indicates that sandblasting operations were not prevalent.
- **Lack of significant paint waste:** Again, paint waste (e.g., cans, buckets) was not discovered to have been dumped on-site. The statement that, anecdotally, some cans were laid upside down to

¹ pmep.cce.cornell.edu/profiles/extoxnet/pyrethrins-ziram/tributyltin-ext.html

dry somewhere else on-site is not significantly supported nor a significant Site issue. In comparison, there were "2,000 paint cans, containers, and drums" (per the 1997 Record of Decision) dumped at the Southern Shipbuilding site.

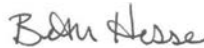
In addition to the observations noted above about the lack of merit for LDEQ's request for additional investigation of TBT, it should be noted that LDEQ's recent Risk Evaluation / Corrective Action Program (RECAP) comments were received nearly two years after the Remedial Investigation/Feasibility Study (RI/FS) Work Plan was approved by both USEPA and LDEQ, and over 25 years after remediation at the Southern Shipbuilding site commenced. LDEQ's TBT request has already resulted in project delays of at least six months while the comment-comment response process has been completed. Additional project delays will result should evaluation of TBT be required. These requests for investigation of TBT or other constituents, which we contend are unwarranted and untimely, will further delay progress in completing the RI/FS and, ultimately, will result in delays for implementation of remedial action. These unnecessary delays do not serve the public interest.

If you should need additional information, please contact Scott Lindenmuth at 312-882-3705 or via email at scott.lindenmuth@ehs-support.com, Beth Hesse at 828-551-9067 or via email at beth.hesse@ehs-support.com, or Jon Hamilton at 225-610-3304 or via email at jon.hamilton@ehs-support.com.

Sincerely,



Scott Lindenmuth
Technical Coordinator



Beth Hesse
Project Coordinator



Jon Hamilton, P.G.
Senior Project Manager

cc: Keith Horn, LDEQ
Tommy Doran, LDEQ
June Sutherlin, LDEQ
Blake Adams, USEPA
SBA Shipyard Site PRP Group